

KAEMPFER CROWELL  
Robert McCoy, No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
Facsimile: (702) 796-7181  
Email: [rmccoy@kcnvlaw.com](mailto:rmccoy@kcnvlaw.com)  
Email: [sgraves@kcnvlaw.com](mailto:sgraves@kcnvlaw.com)

Attorneys for Defendant American  
Express National Bank

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JELMER HOEKSTRA,  
  
Plaintiff,

vs.

CREDIT ONE BANK, N.A.; CAPITAL  
ONE SERVICES, LLC; and  
AMERICAN EXPRESS NATIONAL  
BANK,  
  
Defendants.

Case No. 2:21-cv-02082-GMN-VCF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE TO RESPOND  
(SECOND REQUEST)**

Plaintiff Jelmer Hoekstra and defendant American Express National Bank (“Amex”) stipulate that the deadline for Amex to respond to the complaint (ECF No. 1) be extended from January 24, 2022 until February 21, 2022. This is the second extension sought in connection with this deadline.

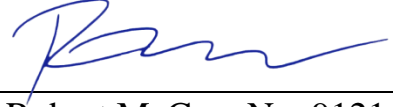
1 This extension is requested to permit the recently hired counsel for  
2 Amex sufficient time to investigate the allegations in the complaint and to discuss  
3 the prospects for early resolution with Mr. Hoekstra.

4 FREEDOM LAW FIRM

KAEMPFER CROWELL

5 /s/ Gerardo Avalos

6 George Haines, No. 9411  
7 Gerardo Avalos, No. 15171  
8 8985 South Eastern Avenue  
Suite 350  
Las Vegas, Nevada 89123

  
Robert McCoy, No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive  
Suite 650  
Las Vegas, Nevada 89135

9 KIND LAW  
10 Michael Kind, No. 13903  
11 8860 South Maryland Parkway  
Suite 106  
Las Vegas, Nevada 89123

Attorneys for Defendant American  
Express National Bank

12 Attorneys for Plaintiff Jelmer Hoekstra

13  
14 **ORDER**

15 IT IS SO ORDERED.

16  
17   
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 1-14-2022  
20  
21  
22  
23  
24